DOE/EH-0588

Wackenhut Services, Incorporated:

Report from the DOE Voluntary Protection Program Onsite Review, *August 10-14, 1998*

U.S. DEPARTMENT OF ENERGY
Office of Environment, Safety and Health
Office of Worker Health and Safety
Office of Occupational Safety and Health Policy
Washington, D.C. 20585

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Foreword

VPP-"The New National Model"

The overwhelming success of the Voluntary Protection Programs (VPP) has been voiced by people at all levels of government, management, and labor over the past sixteen (16) years. The VPP and those people and organizations associated with its success have been the recipients of numerous commendations and awards including multiple "Hammer" awards from the Vice President of the United States.

> ***"The new national model of government regulation is patterned on the successes of programs such as the Voluntary Protection Programs (VPP), which is administered by the Occupational Safety and Health Administration (OSHA) and the Department of Energy (DOE)."***
>
> The White House
> Office of the Vice President
> September 26, 1995

At a White House ceremony in 1995, the Vice President presented two Hammer Awards to recognize the positive impact that VPP had with regard to the National Performance Review initiative on reinventing government. The Vice President stated, "It [VPP] is about working in partnership with common goals, instead of as adversaries to protect the safety and health (S&H) of our workers. It's about focusing a lot less on red tape, and a lot more on results. VPP is the premier example of partnership between government, management and labor."

OSHA-VPP

Since its creation by the Occupational Safety and Health Administration (OSHA) in 1982, VPP has established the credibility of cooperative action among government, industry, and labor to achieve excellence in worker health and safety. As of 1997, there were 394 participants in the Occupational Safety and Health Administration Voluntary Protection Program (OSHA-VPP). A variety of major industries are represented in OSHA-VPP including research and development, construction, utilities, health care, petrochemical, textiles, storage and distribution, wood and paper products, industrial chemicals, and many others.

Injury incident rates for OSHA-VPP participants are 55 percent below the expected average for similar sites. Lost workday injury rates at participating worksites are 62 percent below the expected average for similar industries and workers' compensation costs showed a level 52 percent below the average.

DOE-VPP

The U.S. Department of Energy (DOE) recognizes that true excellence can be encouraged and guided, but not standardized. For this reason, on January 26, 1994, the Department initiated the DOE Voluntary Protection Program (DOE-VPP) to encourage and recognize excellence in occupational safety and health (OSH) protection. This program closely parallels OSHA-VPP.

DOE-VPP outlines areas where DOE contractors and subcontractors can surpass basic compliance with DOE orders and OSHA standards. The program encourages the "stretch for excellence" through systematic approaches that involve contractor and subcontractor employees of all levels in the safety program. DOE-VPP emphasizes creative solutions through cooperative efforts by managers, employees, and DOE.

The DOE-VPP consists of three programs, with names and functions similar to those in OSHA-VPP. These programs are STAR, MERIT, and DEMONSTRATION. The STAR program is the pinnacle of DOE-VPP. This program is aimed at organizations with truly outstanding S&H programs. The MERIT program is a steppingstone for contractors and subcontractors that have good S&H programs but need additional time and DOE guidance to achieve STAR status. The DEMONSTRATION program is rarely used; it allows DOE to recognize achievements in unusual situations about which DOE needs to learn more

before determining approval requirements for the STAR status.

Requirements for DOE-VPP participation are based on comprehensive, integrated management systems where employees are actively involved in evaluating, preventing, and controlling potential hazards at the site. DOE-VPP is designed to apply to all contractors in the DOE complex and to encompass production facilities, research and development operations, environmental remediation activities, and various subcontractors and support organizations.

DOE contractors are not required to apply for participation in the DOE-VPP. In keeping with the OSHA-VPP philosophy, *participation is strictly voluntary*. Additionally, any participant may withdraw from the program at any time.

Contractors interested in participating in DOE-VPP evaluate how well their S&H programs implement the DOE-VPP requirements contained in *U.S. Department of Energy Voluntary Protection Program, Part I: Program Elements.* They may decide to submit an application, using *Part III: Application Guidelines*.

The steps of the application review process involve the area office, operations office, and program office independently assessing the application's completeness and the applicant's qualifications for DOE-VPP recognition. Comments from the review are resolved before the application is submitted to the Office of Worker Health and Safety (EH-5).

DOE-VPP staff members may augment the application by requesting additional information, visiting the site, consulting the program office, talking to the applicant's OSHA-VPP outreach partner, or getting input from the applicant's DOE-VPP customer representative.

If the DOE-VPP Team approves the application, an onsite review is scheduled. Team members are selected based on one or more of the following criteria:

- Is the candidate a subject matter expert appropriate to the site's activities and complexity?
- Does the candidate possess prior VPP experience (DOE and/or OSHA)?
- Does the candidate bring union representation to the team?
- Is the candidate a S&H professional from outside of the Office of Environment, Safety and Health (EH)?
- Is the candidate free of any apparent conflict of interest?

The Onsite Review Team interviews a cross section of employees and management, reviews documents, and makes observations during facility walkthroughs to evaluate the applicant's implementation of DOE-VPP criteria found in *Part IV: Onsite Review Handbook.*

During daily team meetings, Review Team members assess findings, address issues, and seek additional input. At the review's conclusion, the Team presents its recommendation for the level of DOE-VPP recognition to the contractor.

The Team prepares an *Onsite Review Report* that contains the recommendation for recognition, and submits it to the Assistant Secretary for Environment, Safety and Health (EH-1) for approval. The contractor is notified of the Assistant Secretary's decision, and, if approved, the DOE-VPP Headquarters office (EH-51, Office of Occupational Safety and Health Policy) makes arrangements to present the DOE-VPP flag to the site.

This report summarizes the Onsite Review Team's findings from the evaluation of Wackenhut Services, Inc. (WSI) activities at the Savannah River Site (SRS) during the week of August 10-14, 1998. It is a milestone in the Department's efforts to encourage the empowerment of employees, and the efforts to change the safety culture in DOE from compliance-driven *re*activity to continuous improvement–driven *pro*activity.

The purpose of this report is to provide EH-1 with an assessment against the DOE-VPP criteria, together with other information necessary to make the final decision regarding the disposition of WSI's application efforts for DOE-VPP. Included are synopses of Team member findings, and the Team's final recommendation for the site's DOE-VPP recognition. ˜

Contents

Abbreviations and Acronyms

A/IRB—Accident or Incident Review Board

ALARA—as low as reasonably achievable

ASP—Associate Safety Professional

ATTA—Advanced Tactical Training Academy

BLS—Bureau of Labor Statistics

CAT—Consolidated Annual Training

CORE TEAM—WSI Team composed primarily of protective force personnel. Serves as champion and facilitator for continuous safety and health program improvement.

CSP—Certified Safety Professional

DOE—Department of Energy

DOE-VPP—Department of Energy Voluntary Protection Program

DOE-VPP Team—The Department of Energy Headquarters team assigned to review VPP applications, perform onsite reviews, and make recommendations to the Assistant Secretary for Environment, Safety and Health regarding DOE-VPP program recognition.

DOT—Department of Transportation

EH—Office of Environment, Safety and Health

EH-1—Assistant Secretary for Environment, Safety and Health

EH-5—Office of Worker Health and Safety

EKG—electrocardiogram

ES&H—environment, safety and health

ESHD—Environmental, Safety and Health Division

FAA—Federal Aviation Administration

FCC—Federal Communications Commission

GET—General Employee Training

GSA—General Services Administration

ISD—Instructional Systems Development

JHA—job hazard analyses

LWC—lost workday case

MSDS—Material Safety Data Sheets

OSH—occupational safety and health

OSHA—Occupational Safety and Health Administration

OSHA-VPP—Occupational Safety and Health Administration Voluntary Protection Program

OSHD—Occupational Safety and Health Division

PPE—personal protective equipment

PVC—polyvinyl chloride

QISP—Quality Improvement Suggestion Program

RAR—Risk Assessment Report

SRSOC—Savannah River Site Operations Center

SATA—Small Arms Training Academy

S&H—safety and health

SIC—Standard Industrial Classification

SO—Security Officer

SPO—Special Police Officer

SRS—Savannah River Site

SRT—Special Response Team

TARMS—Training Automated Records Management System

TRC—total recordable case

UPGWA—United Plant Guard Workers of America

VPP—Voluntary Protection Program

WARP—Wackenhut Accident Reduction Process

WSI—Wackenhut Services, Inc.

WSI-SRS—Wackenhut Services, Inc., Savannah River Site

WSRC—Westinghouse Savannah River Company

Executive Summary

This report summarizes the Department of Energy Voluntary Protection Program (DOE-VPP) Review Team's findings from the five-day onsite evaluation of Wackenhut Services, Inc. (WSI) at Savannah River Site (SRS), conducted August 10–14, 1998. The site was evaluated against the program requirements contained in *U.S. Department of Energy Voluntary Protection Program, Part I: Program Elements* to determine its success in implementing the five DOE-VPP tenets.

WSI

WSI is the management and operating contractor for DOE security services. At SRS, WSI is a paramilitary organization with the mission of providing security services for SRS. They protect nuclear weapons materials, production facilities, property, and classified matter from theft, sabotage, or unauthorized control. Functionally, WSI activities include access control, property protection, sabotage prevention, law enforcement, criminal investigations, traffic control, canine explosives and drug detection, aviation support, river patrol, alarm equipment monitoring, and a Special Response Team.

Onsite Review Team

The DOE-VPP Onsite Review Team was composed of six individuals, representing a diverse cross-section of individuals from the DOE Office of Worker Health and Safety (EH-5), as well as an industrial hygiene consultant, and a former Hanford worker health and safety consultant. Team members were experienced with Voluntary Protection Program (VPP) principles and application of the VPP tenets, possessed S&H backgrounds, and had management experience.

The Team concluded that WSI met or surpassed all DOE-VPP requirements for STAR recognition.

Evaluation Summary

The Team determined that WSI has met in varying degrees, all the tenets of the DOE-VPP. In every case, WSI programs and procedures exceed the level or degree necessary for compliance with existing standards, DOE Orders, and guidelines. In addition, WSI has systematically integrated their occupational safety and health (OSH) program into management and work practices at all levels. WSI's efforts toward implementing the five major DOE-VPP tenets are summarized as follows:

ì **Management Leadership—**Company management at WSI has set OSH as the highest priority for this site. WSI's management leadership is clearly visible in their commitment to this priority and they fully satisfy the requirements of this DOE-VPP tenet. Communication of policy, ideas, and concerns was a strong point. Area communication rooms and the computer network are heavily relied upon for sharing of safety and health (S&H) program information. Management has gone well beyond simply involving employees. They have empowered employees to make decisions and recommendations for change and improvement throughout the program.

í **Employee Involvement—**During the course of this evaluation, the Team identified several excellent S&H programs in which employees are fully engaged. WSI has a VPP Core Team in place. The Core Team is composed primarily of 10 protective force personnel, one instructor, one supervisor, and three administrative support personnel. The Core Team acts as a catalyst in facilitating worker involvement in the safety program.

WSI has achieved great strides in cultivating employee involvement and building a safety culture among the workforce.

î **Worksite Analysis—**WSI has a thorough and comprehensive worksite analysis program in place that identifies and corrects hazards. Through interviews, document reviews, and site walkarounds, the Team verified that the system

meets the requirements of the seven sub-elements of this tenet.

- ***Pre-use, pre-startup analysis***—Each time equipment, materials, processes, or facilities are purchased or significantly modified, they are analyzed for hazards prior to use.
- ***Comprehensive surveys***—Comprehensive surveys for S&H hazards are performed by the Environment, Safety and Health (ES&H) group, as well as the Core Team.
- ***Routine hazard assessments***—Several self-inspection systems are used to ensure that the entire site is assessed at least monthly.
- ***Routine hazard analyses***—The worksite hazard analysis procedures involve several layers of hazard analysis which are documented and implemented for each individual training program. The umbrella hazard analysis document is called a Risk Assessment Report (RAR), which analyzes all of the hazards onsite and develops procedures that must be followed. The RAR for the Advanced Tactical Training Academy (ATTA) training facility was reviewed and found to be a comprehensive analysis of training-specific activities. During employee interviews, the Team perceived employees to be very willing to express concerns and point out hazards to those conducting self-inspections.
- ***Employee reports of hazards***—Employees are encouraged to submit S&H concerns without fear of reprisal. They can report their concerns either directly to their supervisors, union leadership, area safety representative, or to the ES&H department. Alternatively, an employee anonymously can use one of several telephone hotlines.
- ***Accident investigations***—The accident investigation system uses a team approach to identify the root cause and prevent recurrence. The process clearly defines reporting and evaluation requirements and responsibilities for near-miss incidents, first aid, Occupational Safety and Health Administration (OSHA) recordable injuries and illnesses, and property and vehicle-damage accidents.
- ***Trend analysis***—Injury and illness data, inspection findings, and employee reports of hazards are trended and used to help identify problems with management systems and improve programs.

ï **Hazard Prevention and Control**—Hazard prevention and control efforts at WSI are thorough and comprehensive. Hazards and potential hazards identified through WSI's worksite analysis process are eliminated or mitigated through effective implementation of controls. Corrective actions are documented and tracked to completion. The programs and overall process show extensive integration with the other program elements and fully meet the DOE-VPP tenets. Management, S&H staff, and workers at WSI are singularly focused and aggressive in their efforts to prevent and eliminate hazards.

ð **Safety and Health Training**—The Team identified through review of documents and during interviews that WSI's S&H training program ensures that employees at all levels are aware of their S&H responsibilities and the procedures to work safely.

The training system in use for all employees at the site, including contractor and subcontractor employees, is maintained on a computerized database. This system also tracks dates for any forthcoming individual refresher training. The Team reviewed and verified the records and accuracy of material on this system and found it to be excellent.

Recommendation

Based on the information acquired during the onsite visit, the Review Team unanimously recommended that WSI be accepted into the DOE-VPP at the STAR level. ˜

I. Introduction

The Wackenhut Services, Incorporated (WSI) Savannah River Site (SRS) Department of Energy Voluntary Protection Program (DOE-VPP) onsite review was conducted August 10-14, 1998. WSI was evaluated against the program requirements contained in *U.S. Department of Energy Voluntary Protection Program, Part I: Program Elements* to determine its success in implementing the five tenets of DOE-VPP. The Team consisted of a diverse cross section of individuals from the Department of Energy (DOE) Office of Worker Health and Safety (EH-5), an industrial hygiene consultant, and a former Hanford worker health and safety consultant. The names and organizations of the Team members and DOE officials are found in the Appendix to this report.

WSI is the management and operating contractor for DOE security services. WSI provides the services of an armed, uniformed protective force to safeguard vital areas, administrative complexes, and forested areas which comprise approximately 85 percent of the site. WSI is a paramilitary organization designed to provide total security services to protect the SRS nuclear weapons materials, production facilities, property, and classified matter from theft, sabotage, or unauthorized control. This includes access control, property protection, sabotage prevention, law enforcement, criminal investigations, traffic control, canine explosives and drug detection, aviation support, river patrol, and alarm equipment monitoring. In addition to performing these functions, WSI maintains a Special Response Team (SRT) to respond to all threats to security. WSI currently employs 753 employees and serves a population of approximately 600 DOE employees and 15,000 contractor and other employees who occupy an area of approximately 310 square miles in west central South Carolina. The site is operated by Westinghouse Savannah River Company (WSRC), a DOE contractor. With regard to participation in the Voluntary Protection Program (VPP), WSI has fully integrated its workers with management as depicted in figure 1.

Potential hazards at SRS cover the full range of hazards present in both general industry and those unique to a nuclear weapons site. Examples of hazards with the greatest potential for injury or damage at the site are radioactivity, and chemical hazards from sources such as benzene, toxic waste, bulk chemical storage, and process streams. Examples of other hazards include high risk training, helicopter operations, SRT participation, handling of firearms, material handling, falls, ergonomic-related activities resulting in back/muscle injury, and repetitive motion injuries.

With the end of the Cold War, DOE's mission has changed to one of nonproliferation, safe dismantlement of nuclear weapons, disposition of surplus fissile materials, and maintenance of the stockpile without nuclear testing. Safeguards and security will continue to be at the forefront of the DOE mission at SRS. As specified in the SRS Strategic Plan, WSI must assure that nuclear and other toxic materials stored at the SRS are properly secured.

WSI began investigating participation in the DOE-VPP program before 1994. Prior to submitting their DOE-VPP application in January 1997, WSI obtained complete support from their union, Local 33 United Plant Guard Workers of America (UPGWA), and implemented the WSI Accident Reduction Process (WARP) and Behavior-Based Safety Training provided by Behavioral Science Technology, Inc. This effort allowed WSI to better position itself to apply for and attain DOE-VPP status. The primary purpose of the DOE-VPP onsite review was to assess WSI's implementation of systems and programs to meet DOE-VPP criteria. The Team also verified the information in WSI's application by reviewing additional onsite documentation, and by conducting more than 150 formal and informal interviews of both WSI managerial and nonmanagerial employees. ~

Wackenhut Services Inc., Savannah River Site
1998 Employee Ownership of Safety and Health Processes
Organizational Chart

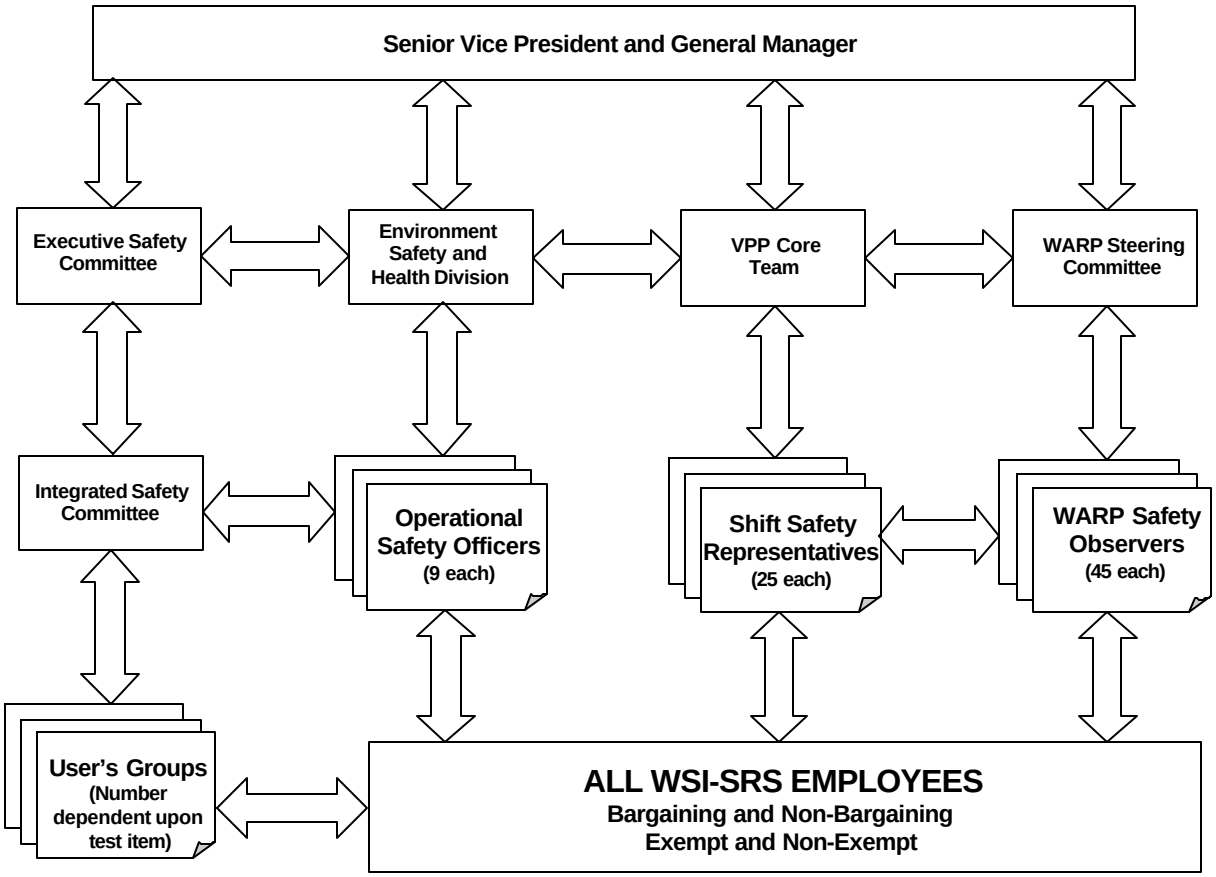

Figure 1—Organizational Chart

II. Quantifiable Program Results

WSI maintains a database to track and trend site-wide injury and illness rates. The data system is used to meet compliance requirements and to strive for excellence through application of the DOE-VPP guidelines. This database is maintained by the Environment, Safety and Health Division (ESHD) at WSI. Recordability decisions are made by an Environment, Safety and Health (ES&H) specialist in consultation with WSRC Medical Department personnel. The Team conducted a sample review of Occupational Safety and Health Administration (OSHA) 200 logs and first reports of injuries and illnesses, and verified that recordkeeping was properly classified and documented in accordance with OSHA's recordkeeping requirements.

WSI compares themselves with other employers classified under Standard Industrial Classification (SIC) 9221, "Police Protection." The Team felt that a comparison with companies under SIC 7381, "Detective, Guard, and Armored Car Services," might be more appropriate; however, there are problems with comparing WSI with either SIC. The Bureau of Labor Statistics (BLS) collects data for SIC 7381 from a wide range of business-related service employers, significantly diluting the specificity of the sample. Review of data collected for SIC 7381 and discussions with BLS officials revealed that few, if any, of those surveyed could be compared to a paramilitary security organization such as WSI. The BLS does not collect data for SIC 9221, "Police Protection," since police agencies are public sector employers exempt from reporting requirements. The SIC 9221 data used for WSI's comparisons are a result of voluntary reporting through the National Safety Council. Because of the voluntary nature of reporting data it is assumed to have inherent bias towards underreporting, i.e., police organizations with high rates will be less likely to voluntarily report.

It should be noted that data limitations are often encountered in making comparisons between employers. WSI however, compared favorably to both SIC 7381 and 9221. In addition, WSI's 1996-1998 injury and illness experience ranked better than the average of all DOE security contractors, with average LWC and TRC rates of 2.7 and 3.6 respectively, compared to averages of 3.0 (LWC) and 5.6 (TRC) for all DOE security contractors.

The rates shown in the four tables below reflect the data for the three previous calendar years. Table 1 provides the total recordable injury/illness rates. Table 2 provides the three-year average for total recordable injury/illness rates. Table 3 provides the lost workday case rates for the past three years. Table 4 provides the three-year average for lost workday case rates. ~

Table 1

Total Recordable Injury/Illness Incidence Rates
(2,000 hours per employee annually)

Annual Total Recordable Case (TRC) Incidence Rates

Calendar Year	TRC Rate	Total TRCs	Total Hours Worked
1996	4.3	34	1,593,996
1997	3.0	25	1,552,725
1998	3.6	17	781,129

Table 2

Three Year Average TRC Incidence Rates

Organization	Three-Year Average
WSI (1996-1998)	3.6
*Police Protection – SIC 9221 (1994-1996)	7.2

Table 3

Lost Workday Case Rates
(2,000 hours per employee annually)

Annual Lost Workday Case (LWC) Rates

Calendar Year	LWC Rate	Total LWCs	Total Hours Worked
1996	3.5	29	1,593,996
1997	2.2	19	1,552,725
1998	2.3	11	781,129

Table 4

Three-Year Average LWC Incidence Rates	
Organization	**Three Year Average**
WSI (1996-1998)	2.7
*Police Protection – SIC 9221 (1994-1996)	3.1

* Information retrieved from the National Safety Council's "Work Injury & Illness Rates" annual publication. Incidence rates for 1997 were not available as of July 14, 1998.

III. Management Leadership

The DOE-VPP tenet for excellence in management leadership was evidenced by WSI's demonstration of top-level management commitment to occupational safety and health (S&H) and the DOE-VPP. The stated security mission of WSI reads: "WSI conducts these varied mission responsibilities with a constant concern for protecting the health, welfare, and safety of employees, the public, and preserving our natural environment." WSI management has fully integrated the authority and responsibility for employee S&H into their management system to ensure that all security activities are carried out in a way that reflects their full commitment to this ES&H priority.

A. Commitment

Company commitment to S&H is clearly established by policy and reaffirmed in the employees' cultural values. WSI management has a comprehensive written S&H policy in place. Both the WSI Health and Safety Policy and the DOE Occupational Safety and Health (OSH) Policy are communicated to all site employees through the initial site orientation training [General Employee Training (GET)], periodic news publications, wall plaques, meetings, committees, and other forums. Procedures and policies for the protective force are available in area communication rooms and the Lieutenants' office. Employee interviews and review of formal training records confirmed that the WSI Health and Safety Policy are well understood by employees. Almost without exception, managers, supervisors, business agents, and hourly rate employees could explain the fundamental concepts set forth in the policy statement. Additionally, it was clear from the Team's discussions with union representatives and most employees that they understood WSI's policy of giving safety the highest priority.

Safety goals and objectives were clearly in place. A worker "Safety and Health Self-Assessment Team" performs the annual S&H assessment. The team's report for 1998 was comprehensive and well written. The intent of this program is to provide a culture of continuous improvement based on distinct performance objectives, and the identification of both positive and deficient practices throughout all levels of the organization. Their findings and recommendations are combined with input from other self-assessment programs to establish safety goals and objectives.

> "WSI will do what we say, when we say it, safely..."

To assure continual safety performance improvement, WSI has instituted the Accident or Incident Review Board (A/IRB). Notably, the injured party is a full member of the investigation team. The injured worker helps develop prevention strategies and lessons learned information to assist in protecting other workers from a similar accident.

B. Written Program

Key elements of a written S&H program, including management leadership, employee involvement, worksite analysis, hazard prevention and control, and S&H training, were verified to be included and integrated into the WSI written S&H requirements/program documents. These documents are WSI standard written procedures covering a comprehensive array of essential program elements. One particular procedure establishes and empowers the VPP Core Team. The Core Team performs a wide range of activities that support continuous improvement of the S&H program.

The Team verified that the detail and complexity of the S&H program were appropriate to the size of the workforce, the complexity of the hazards or potential hazards, and the nature of the operations. The WSI ES&H program plans, procedures, and instructions that cover a number of functional areas are clear, concise, and fully instructive of their respective area coverage. ES&H program guidance was thorough and covered expected operational areas including munitions safety, firing

range operations, emergency response, hazard communication, and other program specific areas.

C. Responsibility

The General Manager has overall or primary responsibility for ensuring the implementation of S&H programs. The stated policy of WSI, however, assigns to each individual employee the ultimate responsibility for their own safety. In doing this, WSI management has empowered the employees and provided the S&H training necessary to recognize hazards, provided the guidance and documentation needed to evaluate compliance issues, and given them the authority to stop work.

Management responsibility for S&H passes from the General Manager to a deputy who manages the three Divisions under which most of the protective force work. Division Directors assign S&H responsibilities to area-specific field supervisors who manage the day-to-day field operations. WSI utilizes an informal matrix management approach where ES&H resources are both aligned under the Director of ES&H and concurrently assist and support other projects and functions throughout the organization. Integration of ES&H resources in this manner provides the technical capability to formulate S&H programs and establish implementation procedures while providing task-specific project managers with staff level policy guidance and day-to-day support for operational priorities. The organizational culture permits free and open exchange of ideas and requests for assistance between different components of the organization. WSI's management approach to integrating ES&H throughout the management structure reinforces the concept that S&H is the responsibility of all employees and ensures that the ES&H staff are fully utilized as a site-wide resource.

Interviews with members of WSI management clearly indicated that they were aware of their S&H responsibilities and committed to a proactive S&H concept which is integrated throughout the site. Management staff interviews also revealed that managers at all levels are extensively involved in the S&H performance goals setting process and utilize the trending analysis and performance indicator programs on a regular basis to identify positive and deficient practices and improve project performance. Interviews confirmed that the primary or fundamental focus of WSI management is to provide every employee with the resources, knowledge, and authority to recognize and modify any work practice that they feel represents an unacceptable risk. WSI managers showed sincere commitment and excitement about the company's progress relative to S&H program improvement.

D. Authority and Resources

Evidence reviewed by the DOE-VPP Team demonstrated WSI management commitment to provide sufficient resources to carry out S&H program responsibilities. Interviews with managers and supervisors indicated that they understand the project goals and associated ES&H risks, and effectively deploy resources adequate to address both priorities. WSI employs approximately eleven (11) personnel who are directly responsible for administering the site's ES&H programs. In addition, staff from other organizations are matrixed to the operational safety team. The functions and responsibilities of the operational safety group are clearly established by company written procedure. One method by which the program involves workers is by assigning them responsibilities to ensure that training exercises are conducted safely. Other support, such as medical services, are obtained from WSRC, another contractor at SRS.

Review of budget figures and documentation confirmed that the combined budgets for the ES&H and Safety Departments are approximately three and one-half percent (3.5%) of the entire WSI budget. A significant portion of the program funding is allocated for training. Management views the resources devoted to S&H as vital to the conduct of their business. This practice coupled with the proportion of the total budget committed to S&H activities clearly demonstrates management's commitment to their stated priority of placing S&H first.

During the course of interviews with management and non-exempt employees, it was clear that everyone has been given the authority to stop

work, or not begin any activity where they feel uncomfortable about their S&H. Indeed, the Team was able to document several incidents in which WSI personnel did in fact stop work.

E. Line Accountability

All project managers at WSI are held accountable for employee S&H within their areas. WSI has a comprehensive performance goals program, which includes an effective trend analysis segment. The intent of this program is to ensure that the project's overall mission, vision, and objectives are met by providing a systematic means for continuous improvement based on distinct performance objectives that identify and measure both positive and deficient practices at all levels within the organization.

Assessments are performed at multiple levels at WSI. The ESHD conducts a comprehensive set of reviews. The Compliance Division performs extensive oversight. The VPP Core Team also performs reviews, including the Annual Safety and Health Program Review. Findings and recommendations from reviews are turned into goals and objectives and tracked to completion.

The use of performance objectives is employed to assess performance in areas such as ES&H, business performance, and customer satisfaction on the basis of predefined objectives and criteria. Performance goals are established at the beginning of each year by each Division. Goals and objectives are rolled up into a site-wide annual WSI strategic plan. The annual goals are established based upon performance during the previous year, the expected work activities for the current year, and in response to adverse trends identified during field surveillance and management oversight activities. The annual performance goals are communicated from the General Manager to the Division Directors and throughout the organization.

The Executive Safety Committee meets at least quarterly to review progress and recommend course adjustments in plans. The VPP Core Team continually collects information through daily observations, discussions with other employees, and special reviews on company safety program progress. The VPP Core Team meets monthly to review findings and formulate recommendations and strategies for program improvement.

Each manager is held responsible for correcting negative trends and remedying deficiencies. It is the responsibility of each manager to monitor area incidence and severity rates, be involved in WARP, conduct investigations of safety violations, and document and share lessons learned for the Lessons Learned Program.

WSI meets the requirement for holding managers and supervisors at all levels accountable for meeting their assigned responsibilities by virtue of a formal system for performance review and career development planning. Managers and supervisors are held accountable for their own ES&H performance as well as that of those under their direction through this system. The DOE-VPP Team reviewed performance agreements for several managers and found a direct linkage between organizational safety goals and manager responsibilities.

The performance evaluation process is not limited to a single, annual meeting for evaluating goals set during the previous year. The process entails ongoing evaluation and feedback throughout the year. Evaluations consist of a listing of the employees' primary responsibilities, which are evaluated in terms of their professional and technical skills, the application of those skills, their effectiveness of the working relationships, and their managerial skills. The performance evaluation also includes a formal process for developing a performance improvement plan when performance improvement is needed.

Performance in the area of ES&H is a standardized category within the performance evaluation system. Actual performance evaluation reviews indicated that the ES&H performance component is weighted equally with all other objectives. It was not possible to factually determine or measure if the ES&H performance element was equally emphasized across the management, supervisory, and professional staff member evaluations. Every evaluation reviewed, however, did have a segment that considered and evaluated safety performance. The individual

evaluation system, coupled with the programmatic performance system, trending system, and other tracking and indicator programs combine to provide WSI with an effective program for holding managers and supervisors accountable for meeting their assigned responsibilities.

F. Visible Management Involvement

Top-level management at WSI is active and visibly committed to excellence in S&H programs and practices. The Team review of documents and programs confirmed that management involvement was at a level consistent with DOE-VPP requirements. Interviews with managers, supervisors, and employees provided anecdotal information, which confirmed the findings of the Team's review.

Managers at every level participate in weekly walkthroughs of working areas and activities. Supervisors are not only concerned with their specific tasks or activities under their jurisdiction during these walkthroughs, but are also empowered to stop any unsafe activity, and have done so, whether it is under their supervision or another manager's control.

Management and employee attitudes conveyed a strong sense of teamwork and mutual respect. It was apparent that WSI has created a workplace culture that has removed most barriers to communication and divisiveness.

Interviews with top-level management at WSI revealed that all managers have an "open door" policy, which is visibly demonstrated by the WSI General Manager. His statement that "WSI will do what we say, when we say it, safely" is factual when it comes to safety commitment. Interviews with other top managers showed that all managers are functionally integrated into safety program operations.

G. Subcontractor Programs

Because of the WSI mission, very few subcontractors are utilized. Those that are hired are pre-screened to ensure that they are capable of complying with site requirements. As is characteristic of many DOE operations, some services, such as medical services and radiation protection, are obtained from WSRC, another onsite contractor.

H. Annual Self-Assessment

The WSI "Annual Safety and Health Self-Assessment" is the responsibility of the VPP Core Team. This responsibility is established in written procedures. The Team is mainly comprised of protective force personnel. Members from administration, training, and other units are also included. The DOE-VPP Team reviewed past and current annual reports and found that the reports have improved. The 1998 report was found to be comprehensive and well written. Completed in the July/August 1998 time frame, the assessment, analysis, and writing were performed by 12 employees, most of whom were Security Police Officer (SPO) IIs. SPO IIs comprise the majority of protective force workers.

The fact that management entrusted employees with the responsibility to perform this important function is indicative of management/labor relationships that best exemplify "Star" DOE-VPP performers.

Summary

WSI management was found to exhibit strong, consistent, and effective leadership. The high degree of employee ownership and safety program involvement reflects well on WSI management. Employee interviews consistently indicated that management depends on employee participation to make the safety program work. Employees genuinely believe that management is in their corner when it comes to safety. In conclusion, WSI has a VPP Star program with regard to "Management Leadership." ~

IV. Employee Involvement

WSI began active pursuit of DOE-VPP recognition approximately 4 years ago. During the early stages of the program, no buy-in or support for VPP existed from either the union or the bargaining unit employees themselves. Approximately 2 years ago, union leadership and union members made a decision to join forces with management. Since that time, WSI and the union have made concerted efforts to inculcate every WSI employee to view VPP values as a way of life both on and off the job. Continuous efforts have been made in cultivating employee involvement and building an excellent safety culture within the workforce. Employee buy-in to VPP and other safety programs is now evident at all levels. On several occasions, including presentations by bargaining unit employees at the Monday morning kick-off meeting, employees used the word "we" in reference to VPP as well as to how workers and WSI management approach the task of finding solutions to safety concerns. This "we" culture is indicative of a Star level of employee involvement.

During the course of the evaluation, the Team interviewed approximately 10 percent of the bargaining unit employees. Job classifications of the interviewees were Security Officer (SO) and Security Police Officers II & III (SPO II & III). All SPO III's are assigned to the SRT. The interviewees have an average of 14 years with WSI. Interviews and discussions covered a wide range of topics related to the following subject areas:

- Management commitment to safety,
- Management support of worker safety concerns,
- Employee commitment to safety,
- Employee support of VPP and other safety programs,
- Stop work authority,
- Accident/incident investigation,
- Worker input, and
- Worker review of procedures.

Without exception, the interviewees stated that management, from top to bottom, not only "talks-the-talk" but also "walks-the-walk." Over the past 2½ to 3 years, the workforce has noticed a continuing improvement in management's commitment to making the work environment as safe as possible. The one aspect of management leadership which was interesting to observe was that of the first line supervisors working side-by-side with the security officers. These personnel work together so well that it was difficult to tell the difference between a sergeant and a rank-and-file worker. Likewise, if not for the bars on their collars it would be difficult to distinguish the lieutenants from the security force workers. Safety discussions are always a regular part of the daily routine crew meeting (muster) prior to the start of work. Workers are always encouraged to bring up safety concerns for discussion.

> "...Employees used the word we, in describing how they (labor and management) work. Employees stated that management, "talks the talk" and "walks the walk."

Workers are involved in promoting safety in the workplace in several ways. One of the first indications of this was that the majority of the VPP Core Team are non-exempt and bargaining unit employees. Every crew has at least one safety observer; however, most have two. The safety observers are trained to be alert to conditions in the work place which may compromise safety and methods to mitigate the situation. Every crew also has a safety representative. The safety representatives are responsible for working with their fellow employees and management in finding solutions to safety concerns which the workers themselves are unable to resolve. Interviewees indicated that they are always able to have their concerns heard in a timely manner. One interviewee recalled a

situation which occurred while on perimeter patrol. As he drove up to one of the remote, seldom used security gates, he noticed several railroad rails in the road. Realizing that this gate would be needed in the event of an emergency, he immediately notified management of the situation. When he returned to the gate later in the shift, the rails had already been removed. In another instance, a canine handler recalled discovering that one of the dog's teeth were long enough to penetrate the standard pads used in training. The situation was reported to management and a complete set of new, thicker pads were acquired on a priority order. None of the interviewees reported any misgivings about using their stop work authority, nor did they report any concern of reprisal for using it. The company policy on stop work is that when a worker stops work, they have the final say in deciding if the "fix" is the correct remedy.

Workers are always encouraged to watch for safety hazards, and if possible, analyze the situation and correct it, if they can do so without compromising their safety or that of others. If the condition calls for corrective action which they are not qualified to undertake, they are always encouraged to bring the condition and, if they have one, a proposed solution to the attention of their safety representative or management. WSI recently instituted a policy requiring that the employee who finds or reports a S&H problem, or his designee, must agree that the problem has been corrected. All interviewed employees indicated that they felt empowered to stop work, with many individuals relaying specific examples of when they actually did stop work. Notably, protective force personnel were empowered to correct many problems on their own. In other cases, employees felt free to speak with a supervisor or safety division person. The company has successfully created a culture wherein the correction of problems is not inhibited by organizational protocols; rather employees can and do speak with anyone they want to get problems fixed quickly. The Team found that adequate authority and resources had been assigned within the WSI S&H program.

Most interviewees felt that even though they currently receive excellent training, they can always use more safety training. Two groups, the K-9 crew and the SRT, spend the vast majority of each work day in training. Training and readiness is their number one assignment. The Onsite Review Team found that when new training programs or equipment are proposed, members of the workforce are included in the initial "test run" to determine the appropriateness of the proposed addition. During the time of the evaluation, the company was testing several new firearms. As part of that evaluation, a cross section of the workforce with varying degrees of expertise on the firing range were brought in to test the new firearms. This effort was used to determine if the firearms were capable of helping those who had historically scored lower to improve while at the same time allowing those who had historically scored higher to sustain or improve their accuracy.

General Observations from Employee Interviews

Workers conveyed that their input is respected and more often than not acted on by management in a timely manner. It is the workers' perception that WSI management is committed to safety as a primary objective. There is a strong feeling of ownership on the part of the rank-and-file workers, not only for VPP but for the other safety programs as well.

Summary

Employees are truly involved in the safety program at WSI. Their participation and input is highly proceduralized in WSI Policy. More importantly, worker involvement seems to happen naturally as a matter of course. WSI workers and management have institutionalized cooperation and teamwork on matters of safety. The DOE-VPP Team unanimously felt that WSI has met and exceeded the VPP requirements for employee involvement. ~

V. Worksite Analysis

A. Pre-Use, Pre-Startup Analysis

Pre-startup analysis of S&H considerations was demonstrated in two activities appropriate to this type of analysis. The two activities are new training programs and performance exercises. The hazard analysis procedures for each of the activities are discussed in detail in the section on job hazard analysis (JHA).

B. Comprehensive Surveys

A trained professional industrial hygienist performs annual walkthroughs of all WSI areas assessing potential S&H hazards specific to WSI personnel. The areas surveyed include all barricades and guard posts throughout the site. Other areas addressed by the annual survey include the Armorer, maintenance area, and the Small Arms Training Academy (SATA) and Advanced Tactical Training Academy (ATTA) facilities. The annual walkthrough surveys are performed only by the industrial hygienist; however, input is solicited from area guards throughout the survey process.

Although the potential for exposures to hazardous substances is extremely limited, the industrial hygienist performs air monitoring where the potential for exposure exists. For example, airborne lead concentrations at the firing range were measured on a monthly basis. Because the results of these samples were so low, the sampling protocol was relaxed to quarterly, then semi-annually, and now are annual. This is an excellent example of S&H staff responding to quantitative data and changing their procedures accordingly. The files of air monitoring data were reviewed and found to be in excellent order.

In addition to annual walkthrough surveys, Occupational Safety and Health Division (OSHD) personnel conduct monthly assessments and surveillances, ensuring compliance with WSI standard procedures. OSHD personnel also conduct assessments and surveillances of nonrange activities including administrative support activities.

WSRC medical personnel conduct medical assessments. One example is Dr. W.G. Entrekin, who conducted assessments on the SRT during Tactical Proficiency Evaluation training.

C. Routine Hazard Assessments (Self-Inspections)

WSI has several mechanisms that provide routine self-inspections. The management walkdown process (procedure 1-3304), the Behavior-Based Safety Process (procedure 1-3117), and the activities of Shift Safety representatives assure frequent, ongoing self-inspection. The most recent Safety and Health Self Assessment identified that on a few occasions, employees did not receive direct feedback on their safety concerns. A revised procedure was implemented requiring that problems are reviewed and the solution approved by the person who initially identified the problem.

D. Routine Hazard Analyses

WSI does a thorough job of performing hazard analyses. Because trending analysis has identified an increased risk during training exercises, a major target of their analysis focus is on training exercises. Careful attention is paid to mitigating unnecessary risk and documenting lessons learned for use in modifying future training exercises.

E. Employee Reports of Hazards

Employee reports of hazards are handled in an expeditious fashion by WSI S&H personnel or Westinghouse personnel. Interviews indicated that they have multiple options in terms of reporting hazards including to their immediate supervisor, directly through WSI S&H professionals, or through the site-wide hazard reporting systems.

There were several anecdotes of S&H hazards being reported and addressed immediately. One

guard reported that paint fumes from an oil-based paint being applied in a hallway with limited ventilation were making him feel uncomfortable. This was reported directly to the OSH Compliance Officer of the WSI OSHD, who reported to the area immediately. The material safety data sheets (MSDS) for the paint were reviewed and it was determined that the paint did not contain hazardous materials with acute side effects. Nonetheless, the compliance officer was able to meet with the supervisor in charge and secure temporary ventilation for the area, which was installed immediately.

F. Accident Investigations

WSI has a two-pronged incident investigation system with one procedure addressing accidents (defined as property loss of greater than $1000) and incidents (defined as any OSHA reportable injury or illness). An accident or incident investigation may be invoked by the supervisor of an individual regardless of whether the above criteria are met.

The first step in the investigation is the creation of an A/IRB, which must include:

- the individual(s) directly involved in the accident or injury;
- witnesses to the accident or injury;
- the supervisor;
- a representative of the WSI ESHD;
- a union representative if requested by the individual(s) involved;
- others as needed.

The A/IRB must be assembled and meet within 10 days of the accident or incident. It is the responsibility of the supervisor of the individual(s) involved to create the review board. The goal of the review board is to investigate the cause of the accident or incident and to propose corrective actions that will prevent it from occurring again. The review board's investigation may result in punitive action, although this is not the function of the investigation per se.

The review board interviews all individuals involved regarding the sequence of events that led to the incident. The review board also solicits input on how this might be prevented in the future. A formal root cause analysis may be performed. The review board is required to produce a corrective action plan which is then disseminated in the form of a lessons learned document via e-mail and in hard copy to those employees without e-mail.

An accident investigation file was reviewed and the analysis was thorough and comprehensive. Several lessons learned documents were reviewed and it is clear that these documents are disseminated widely. There appears to be a high level of employee involvement throughout the investigation process. Clearly, this component of the work site analysis tenet reflects a level of Star status.

The accident investigation procedure was highlighted to the assessment team by analysis of the ongoing investigation into the ricochet/shrapnel accident in June 1998. WSI hosted the annual DOE-wide security force competition. Part of the event involved a hand gun proficiency competition at the firing range, where participants move from target to target, followed by a group of observers or scorers. At one of the stations, a fragment of the copper casing or metal jacket ricocheted back from the target and struck an observer in the arm. Reportedly, the observer was back beyond the expected 20 degree zone of deflection.

Following the accident, the use of this type of target was suspended pending an investigation. An extensive investigation was performed in which similar targets were surrounded by witness paper. This paper captures the trajectory of fragments from the target allowing the investigators to graph the bullet fragment's path. It was found that when the marksman hit a welded seam on the target, bullet fragments had a different ricochet trajectory than the expected trajectory. It is believed that this was the causative factor in the accident. Further investigation is ongoing; however, all similar targets have been redesigned and have had the weld seam removed. An additional measure

currently under consideration to address this hazard is the use of frangible bullets (made of a ceramic glass like substance) that turn to powder upon impact, thus eliminating the possibility of a ricochet.

G. Trend Analysis

Trend analysis is performed on injury and illness data and reported on a monthly basis at the monthly company S&H meetings. The recordable injuries, as an absolute number not as a rate, are tracked from month to month and compared to 1997 numbers. The injury limit for 1998 was set at 33 and as of July 1998 there were 18. In addition, the monthly trending report covered during the monthly company S&H meetings presents a five-year comparison for each indicator year through the most recent month.

There are no occupational exposures to chemical or radiological hazards that would require trend analysis. For example, the Team examined the airborne lead data for the past several years and all of the samples were just above the limit of detection and well below the action level. There have been extensive noise surveys of various operations (sirens, helicopter take off and landing) but all of these are periodic and limited in duration, hence limiting the exposure. For example, a police cruiser was surveyed inside with the siren on and found to have a noise level of 95 decibels which would require a full two hours of exposure to reach the 8-hour threshold limit value. Incidently, there have been no threshold limit shifts in any of the participants in their hearing conservation program.

H. Job Hazard Analysis

WSI protective force personnel are not routinely exposed to classic industrial S&H exposures. The majority of guard personnel are positioned at entry points on perimeter fences or at a building or area entrances. Typically, posts are sufficiently removed from noise, chemicals, radiation, and other common industrial hazards. The training program imposes the greatest routine S&H risks for the protective force. Because of these risks, the Team decided to focus on the training facility to evaluate JHA procedures. Subsequently it was found that a parallel activity—performance testing—also involved a potential for exposure to S&H hazards. The discussion below will present hazard analysis procedures for these two types of operations.

Training is one of the most hazardous job duties for security personnel at the SRS site, involving strenuous physical activity, discharging of firearms, and utilization of complex equipment (i.e., jet boat, helicopter, etc). Training facility personnel are fully aware of this hazard potential. The worksite hazard analysis procedures involve several layers of hazard analysis which are documented and implemented for each individual training program. The umbrella hazard analysis document for WSI is the Risk Assessment Report (RAR). The RAR mandates the analysis of all hazards and the development of required mitigation procedures. The RAR for the ATTA training facility was reviewed and found to be a comprehensive analysis of onsite training-specific hazards.

Subordinate to the RAR document is a facility procedures manual that lays out job- or activity-specific procedures that must be followed at the site. The facility procedures document and specific procedures are developed by appropriate subject matter experts in collaboration with S&H professionals. Firearm safety is paramount at this training facility and the prescriptive rules for firearm safety are posted at the front gate. An administrative control disallows any unholstering of firearms until ordered at the range. The potential penalty for unholstering a firearm when not authorized includes termination. This administrative control is ingrained in WSI personnel and all armed officers interviewed were cognizant of the policy. The unholstering policy is a good example of the comprehensive safety culture at WSI.

Each training program is based on a job task analysis of the job for which the training is being developed. A lesson plan is then developed based on the job task analysis. A formal risk analysis is performed for each exercise in the training program that may be hazardous. The draft lesson plans are then sent to the ESHD which approves

the plan, or comments, and sends it back to the training staff for revision. When the ESHD approves the lesson plan and risk assessment components, the plan is then forwarded to the curriculum development. The plan must then be reviewed and approved by the training director.

After approval by the training director, the course (depending on hazard level) will be run as a trial. For example, WSI is currently involved in developing a training program on Aerial Door Gunnery in which the ability to fire from the helicopter will be tested.

The training facility has modified its equipment through time, based on experience and periodic hazard analyses. Examples of hazard mitigation changes include:

- The fence used for training has been reinforced to handle the repeated weight load of trainees climbing over it.
- The barbed wire has been removed from the fence and replaced with straight wire.
- The landing area on the other side of the fence has been filled with sawdust to cushion landings.
- Gloves are required during field training exercises.
- All holes in the field have been filled and the grass cut low.
- Short obstacles have been designed with flexible polyvinyl chloride (PVC).
- The obstacle equipment has been added where appropriate.
- A 185-pound drag dummy replaced a drag device that allowed inappropriate lifting procedures.

In a parallel effort to the ongoing training program, performance tests are periodically performed which simulate potential security threat scenarios. Because these are often performed at night and virtually anywhere onsite, they can be dangerous in terms of the potential for S&H hazards.

As with the training program, there is a multi-leveled hazard analysis procedure which is included in the development of the performance test plan. This document addresses all identified S&H hazards, required personal protective equipment (PPE), and administrative controls. The document is developed by the compliance division in collaboration with the ESHD. The physical area of the performance test is walked down and hazardous areas are identified and excluded from play.

The performance test plan also specifically addresses procedures for excluding the shadow force (guards with live ammunition actually guarding the facility) from the personnel involved in the exercise. ~

VI. Hazard Prevention and Control

A. Access to Certified Professionals

WSI's ESHD is led by the Division Director, Jim Brown. Tom Martin, a Certified Safety Professional (CSP), leads OSHD. Kevin Cannon, the OSH Compliance Officer, is an Associate Safety Professional (ASP) and a Certified Hazardous Materials Manager. Mr. Cannon intends to sit for the CSP exam this September. Mr. Cannon was afforded a review course in North Carolina before sitting for the ASP and more recently a review course in Florida for the CSP. Clearly, there is a commitment on the part of WSI to support S&H professionals in their pursuit of certifications.

OSHD currently has vacant positions for a Radiation Safety Officer and a Chemical Biological Warfare Officer.

Chris Wells is the staff Industrial Hygienist and Jennifer Salvo is a Senior Safety Technician reporting to Chris Wells. Mr. Wells is preparing to sit for the Certified Industrial Hygienist exam given by the American Board of Industrial Hygiene and may do so as early as October of this year. Mr. Wells also reported receiving considerable support from WSI for the certification process.

In addition to certified S&H professionals, WSI employs two physical fitness specialists who are certified as health fitness instructors by the American College of Sports Medicine. Because of the emphasis on physical training and exercise, this expertise is critical to the WSI mission. The physical fitness specialists report having a close working relationship with many of the security personnel that are working out regularly at the site's exercise room. In addition, the certified exercise physiologist works closely with any of the WSI personnel that are required to enter a remedial fitness program.

B. Methods of Hazard Control

WSI employs a standard hierarchy of controls approach to the mitigation of hazards in the work environment. An example of the use of this hierarchy of controls are the safety measures employed at WSI firing ranges.

Engineering Controls

The firing ranges are designed with a barrier to capture rounds after they have penetrated the target. Behind the barrier is an impact area which is longer than the maximum length a bullet can travel considering the optimal travel angle of the gun.

WSI is moving towards the use of frangible ammunition (substitution) because of safety considerations (minimal ricochet potential) and environmental consideration (elimination of lead). A new "shoot house" is currently under construction which will be lead free and where only frangible ammunition will be used.

Administrative Controls

Both the SATA and the ATTA have extensive administrative controls to ensure safety at the firing range. The type of weapon that can be fired at SATA is limited because the capture zone behind the retainment area is of insufficient length to allow for the maximum travel expected for all types of weapons. There are specific procedures for every detail of handling the weapon, loading it, inserting your trigger finger, firing, and cleaning the weapon. These administrative controls appear to be strictly enforced.

Personal Protective Equipment

PPE required on all firing ranges includes eye and ear protection. These PPE requirements are observed at both ranges operated by WSI.

C. Positive Reinforcement

The positive reinforcement system for safe behavior and the reporting of unsafe conditions is extensive at WSI and dovetails with the site-wide

program. The following are components of the positive reinforcement system.

Rewards Tied to Injury and Illness Rates

The entire site has the 33:4 goal or limit (33 recordable injuries and 4 motor vehicle accidents). The WSI force is broken down into 9 work elements, or groups with subordinate goals/limits, which are based on the size and hazardous nature of the work. If an element has no recordable injuries or vehicle accidents during the 1st and 3rd quarters of the year, all members are entitled to a gift with a value of approximately $5.00 (coffee mug, gym bag, etc.). If at the semi-annual mark, the site-wide numbers do not exceed half of the annual limit then all WSI personnel are entitled to a gift valued at $10.00. If the annual limit is not exceeded, all WSI personnel receive a $25.00 gift. The "limits" are established by the executive safety committee and are based on the previous year's performance and projected activity.

Spot Safety Award

Any WSI employee that observes someone (anyone onsite regardless of their employer) perform a safety-related act may nominate that person for a spot safety award. To nominate someone, the observer is simply required to send a note with a one to two paragraph description of the safe act to the employee's supervisor. The supervisor then presents the employee with a certificate. All certificates with the 1 to 2 paragraph write-up are reviewed by VPP Core Team members, who select one recipient to receive the monthly lapel pin.

Wackenhut Coin of Excellence

Although this quality award is not focused exclusively on safety, the coin of excellence is often awarded for a safety-related matter. Any WSI employee may nominate any other WSI employee (although managers and above are not eligible) for this award. A certificate for a meal out is associated with this award.

Quality Improvement Suggestion Program (QISP)

QISP receives employee suggestions on safety or other areas. If the suggestion is implemented, the employee receives a $50 savings bond. If the suggestion is implemented site-wide, the employee may be eligible for a larger prize from the site-wide suggestion system.

Outstanding Service Award and Employee of the Quarter

The outstanding service award involves a $250 cash bonus as does the employee of the quarter award. Supervisors nominate individuals for the outstanding service award, but any employee can nominate a colleague for the employee of the quarter award. These awards are not necessarily limited to safety circumstances but have been awarded for safety-related behavior in the past.

D. Disciplinary System

WSI provides a progressive disciplinary system which is initiated with a verbal reprimand. The second time the same safety violation occurs, a memorandum is written and placed in the employee's file. The third incidence of the same safety violation is grounds for dismissal. As reviewed in the administrative controls section of this report, there are firearms-related safety violations that can result in immediate dismissal.

E. Preventive Maintenance

WSI follows guidance provided by security orders in maintaining protective force equipment. Some examples of preventive maintenance include cleaning of field weapons, pre-operational safety inspection of vehicles and helicopter maintenance.

WSI relies on other site contractors and the General Services Administration (GSA) to provide major equipment and facility preventive maintenance (i.e., vehicles, grounds maintenance, electrical work). WSI also maintains its own preventive maintenance program which includes the scheduling/maintenance of the following:

- automobiles,
- industrial hygiene equipment,
- boats,
- communications equipment,
- firearms,

- helicopters,
- bottled water management, and
- cushman scooters.

Automobiles. WSI-assigned vehicles are maintained by GSA on a scheduled program. The vehicles are sent to GSA for all scheduled maintenance in accordance with GSA-prescribed time frames. Daily operational inspections are conducted by vehicle operators prior to use.

Industrial Hygiene Equipment. Industrial hygiene equipment is on a maintenance and calibration schedule. All equipment is sent to the manufacturer for routine maintenance and calibration in accordance with federal standards and manufacturer's recommended guidelines. The OSHD has developed an equipment list which specifies the calibration date, manufacturer phone number, and serial/model number for the different types of equipment.

Boats. Two boats are assigned to WSI and are maintained on a scheduled program by the WSI General Maintenance Shop. The boats are sent to the WSI General Maintenance Shop for all scheduled maintenance in accordance with the prescribed time frames. Additionally, daily operational inspections are conducted by the operators prior to use.

Helicopters. WSI has a Federal Aviation Administration (FAA) certified BK-117 mechanic who performs all scheduled and preventive maintenance in accordance with MBB-BK117 and Lycoming maintenance manuals and FAA guidelines. The Aviation Operations Department uses an electronic database to track and implement FAA guidelines.

Cushman Scooters. Two Cushman Scooters are assigned to WSI and are maintained on a scheduled program by the WSI General Maintenance Shop. The scooters are sent to the WSI General Maintenance Shop for all scheduled maintenance in accordance with the prescribed time frames. Additionally, daily operational inspections are conducted by the operators prior to use.

Communications Equipment. The Technical Communications/Electronics group performs the preventive maintenance on all WSI radio equipment in accordance with WSI Standard Procedures 1-1850 and 3-1850, which outline the preventive maintenance requirements for the communications equipment assigned to WSI. The equipment is maintained by Federal Communication Commission (FCC) or Certified Personal Communications Industry Association Mobile Communications Technicians in accordance with the manufacturer and federal requirements. The electronics group is responsible for portable and mobile communications units, fix station radios, the engagement simulation system, traffic radars, and the Tacho-graph computers used in patrol cruisers.

Work that is not done in house or is covered by the manufacturer's warranty is sent to the manufacturer for service. Currently the preventive maintenance tracking system is being upgraded. The new upgrade is to be fully operational in September. Until then, dual tracking is being conducted on both the new and old systems. The Team queried the databases for radios that have been in preventive maintenance and those scheduled in the future. Under both systems, the Team was able to identify key information about the type of service needed, when it was performed, and when the next service is due. The new electronic system will also be able to generate an in-shop backlog report and daily status reports.

Firearms. WSI firearms are maintained in accordance with WSI Standard Procedure 1-1705. Two Central Training Academy Certified Armorers perform maintenance and preventive maintenance work on the site. The two Armorers are factory authorized and have received military-approved training for each type of firearm available for use on the site. All firearms are inspected on a semi-annual basis and are tracked by a sophisticated database by part, location, area, cost, type, and repair.

Bottled Water Management. The WSI maintenance shop has ownership of the bottled water management program. Bottled water used

for consumption in work areas and office spaces is maintained in accordance with WSI Standard Procedure 1-1814. Typical preventive maintenance of the coolers is a routine cleaning.

Interviews and walkarounds of the various maintenance shops were a clear indication that employees place a very strong emphasis on preventive maintenance as well as housekeeping responsibilities. All shops maintained impressive recordkeeping systems relating to preventive maintenance and were exceptionally clean with potentially hazardous areas clearly identified. Employees interviewed have not had to stop work as a result of unsafe working conditions but indicated they have full responsibility to do so should they encounter such an event.

F. Emergency Preparedness and Response

WSI has a communication system that is intimately linked with the Savannah River Site Operations Center (SRSOC). The law enforcement officer and guard radio control officer reside in the SRSOC control room as the emergency duty officers. Therefore, WSI has the highest degree of coordination with site authorities in the event of an emergency caused by the release of a hazardous substance.

WSI personnel's responsibilities in the event of such an emergency are to evacuate upwind, report the incident (using a who, what, when, where reporting scenario), and then secure the area from a safe distance. This role is consistent with the training requirements for a first responder awareness level emergency responder. All WSI guards—security officers and special police officers—have been trained and are annually refreshed at the first responder awareness level. This training develops competency with the Department of Transportation (DOT) hazardous material handbook, which is appropriate to the guard's level of involvement in emergency response operations.

WSI's safety objective indicates that ES&H objectives will take precedence over routine operational requirements. However, as is necessary for an operation of this nature, this implies that when security is threatened, the mission of the protection of SRS will take precedence.

In the event of an adversarial attack that results in the release of a hazardous material, WSI personnel will first neutralize the adversary and then secure the area. The hazardous material will then be contained and removed by SRS's hazardous materials response team.

G. Medical Programs

WSI's medical surveillance program is run via agreement by the Westinghouse Medical Team. There are eight Occupational Physicians employed by Westinghouse who may be involved in physical examinations of WSI personnel; however there was an Occupational Physician who identified himself as the lead for WSI. This Occupational Physician has 20 years of experience as an internist and had worked for the last seven years as an Occupational Physician.

WSI requires a complete physical examination on an annual basis for Special Police Officer IIs and IIIs and a physical every other year for security officers. The examination was recently revamped into a two-phase procedure. In the first phase, the following examinations are performed:

- complete blood workup,
- urinalysis,
- rectal and testicular exam,
- breast exam,
- electrocardiogram (EKG),
- chest X-ray (optional),
- stress test (based on risk factors), and
- complete physical examination.

The second phase of the examination takes place after all of the test results are received by the Occupational Physician. The individual is brought into the medical facility to discuss these results with the Physician. The Occupational Physician indicated that these examinations include preventive services such as immunizations and cancer screening procedures.

The Occupational Physician interviewed was extremely well versed in the potential hazards associated with WSI operations. The Physician had personally observed many individual operations, including eight hours of training.

Several anecdotes were shared where the Occupational Physician's input was incorporated into WSI policy. For example, three similar injuries were observed by the Physician that reportedly occurred during the same training exercise (a take down procedure). The Occupational Physician requested to observe the training program and determined the take down procedure to be unsafe. It was eliminated from the program.

Another example of the high level of coordination between the Occupational Medical Department, the WSI OSHD, and WSI personnel in general is the potential exposure to airborne lead at the firing ranges as discussed earlier in this report. There, the requirement for blood lead screening was relaxed based on consistent quantitative data indicating no measurable exposure. Employees may request a blood lead screening at their option.

H. Radiation Protection

WSRC provides radiological control services for SRS that include job coverage, surveys and air sampling, whole body counter facilities, dosimetry monitoring, and exposure reports. The Radiation Safety Officer for WSI provides oversight and coordination between WSRC and WSI. WSI Standard Procedure 1-3106, *Radiation Protection Program*, guides the overall Radiation Protection Program. WSI has an As Low as Reasonably Achievable (ALARA) Committee, which is composed of a representative from each zone, administrative radiological workers, training personnel, and special operations personnel.

WSI maintains extensive employee exposure logs which are generated both quarterly and monthly by WSRC. A review of sample files indicated there had not been any high exposures reported. This was validated by the WSI Industrial Hygienist, who is also temporarily serving as the Radiation Safety Officer. Interviews with employees, mainly protective force personnel, confirmed a high level of awareness of the radiation hazards that exist onsite as well as the relative procedures and regulations in place to mitigate those hazards.

I. Confined Space Entry

It is a security order that WSI personnel will not pursue adversaries into a confined space. Rather, they will secure all routes of egress from the confined space and wait for the adversary to exit. There are no scenarios in which WSI personnel would be required to enter a confined space. Therefore, WSI does not maintain a confined space program.

J. Respiratory Protection Program

WSI operates an advanced respiratory protection program. All participants in the program receive an extensive annual physical examination which includes a respiratory function test, an optional chest X-ray, EKG, and based on age, a stress test. After passing the annual physical, each participant receives a quantitative fit test on the type of respirator they are assigned.

Respirator use for security police officers is limited to emergency situations. Therefore respirators are only routinely used by WSI personnel during semi-annual requalification for firearms proficiency, which requires the use of a respirator and the annual respiratory fit test. Respirators also may be required during performance testing exercises.

K. Employee Concerns and Quality Improvement Suggestion Program (QISP)

All individuals interviewed reported having unfettered access to appropriate interventions for mitigation of identified hazards in their work environment. There was a sense of personal responsibility for their work environment, and identified hazards that could be mitigated by the guard on duty were handled directly. Identified hazards that required more extensive mitigation and outside assistance were reported in at least three different ways. First, Security Officers and

Security Police Officers reported having direct access to Kevin Cannon, the OSH Compliance Officer as well as other members of the OSHD. Mr. Cannon's responses to these reports were characterized as thorough, rapid, and complete.

An example of this reporting mechanism involved a guard posted in a hallway that was being painted. The paint fumes made the guard uncomfortable, which he reported to the shift lieutenant, who in turn reported directly to Kevin Cannon. Mr. Cannon immediately visited the site, interviewed the officers involved, and reviewed all of the associated MSDSs. It was determined that there were no direct negative acute potential health impacts associated with the constituent chemicals. However, the building's shift senior (ultimate responsibility for the building) was consulted and moveable fans were set up to ventilate the hallway during the painting operation.

In addition to contacting Mr. Cannon directly concerning S&H concerns, personnel indicated that they reported this type of information directly to their shift supervisor. The response in this case was also thorough, timely, and complete.

Lastly, all protective force members have access to a Shift Safety Representative. Each shift in each area has an identified Shift Safety Representative who serves as a point of contact for reporting S&H concerns during each shift. These safety representatives are an extension of the OSHD and have received 32 hours of hazard identification training. Shift safety representatives are required to perform quarterly walkthrough surveys of all posts and facilities within their area.

In addition to these three routes of direct communication, WSI personnel have several avenues to report concerns anonymously. These redundant routes of communication allow employees to voice any concern anonymously and without fear of reprisal. These include:

- the WSI Employee Concerns Hotline at 803-952-7670,
- the DOE-SR Concerns Hotline at 803-725-7233, and
- the WSI Corporation Hotline at 1-800-275-8307.

The Employee Concerns Hotline provides access for all employees to the WSI Dispute Compliance and Resolution Administrator. Employees state their concerns, providing their name and telephone number, so a response can be provided to them. The form used in the evaluation process does not provide any information pertaining to the employee raising the concern. The information is then forwarded to the ESHD to determine if there are any safety or health implications.

QISP allows employees to make a suggestion on any topic, not just S&H. The vast majority of WSI personnel interviewed had participated in this program by having submitted at least one suggestion. The QISP has a standard submittal form which is forwarded to the supervisor and then into a site-wide tracking system. Individuals whose suggestions are approved and implemented receive a $50 savings bond.

L. Explosives Safety

WSI maintains an extensive explosives safety program which is administered by the WSI ESHD. The WSI explosives safety program procedures are outlined in the WSI Explosive Safety Manual which includes the WSI Standard Procedure 1-3118, the DOE Safety Procedure M440-1, and other Federal regulations. All explosives handlers receive the necessary training on storing, handling, and transporting all types of explosives onsite.

The explosives maintained onsite are used by the Canine section primarily as explosives training aids during canine explosives detection training, drills, and demonstrations. These training aids require the minimum amount necessary for scent application. They are stored in a bunker which is monitored on a daily basis. WSI works very closely with DOE, the South Carolina Department of Health & Environmental Control, and the explosives unit of Fort Jackson in determining how to destroy any "damaged" explosives identified during routine inspections.

Employees interviewed indicated that the explosives safety program has been greatly enhanced by the latest DOE Explosives Safety

Procedure which "outlines the things we must do" in a clear and easy to understand manner. Additionally, it was repeated several times that within the past 1-2 years safety has come to the forefront with emphasis on getting everyone involved. Employees are looking out for each other at all levels; safety is not just a "Management" program.

M. Self-Inspections

WSI conducts seven types of self inspections throughout the year in accordance with WSI Standard Procedure 1-3105, *Inspection Programs*. These inspections are Quarterly Supervisor Inspections, Employee Complaint Inspections, Union Complaint Inspections, Special Emphasis Inspections, Safety/Industrial Hygiene/ Environmental Assistance Visits, Management Walkdown Inspections, and Equipment Inspections.

Quarterly Safety Inspections. Supervisors are responsible for conducting formal and informal inspections in their areas, reporting the results, and correcting any noted hazards. Supervisors are required to conduct inspections quarterly in their areas of responsibility. Results of the inspections are sent to the ESHD within five days of the end of the calendar quarter. Each deficiency identified is assigned an internal corresponding tracking number. The supervisor notifies the ESHD in writing when all deficiencies have been corrected.

Employee Complaint Inspections. If an employee notifies a supervisor of a hazardous or potentially hazardous condition, the supervisor will investigate the complaint; however, if the supervisor is not capable of correcting the problem, ESH personnel will investigate the complaint. ESH personnel perform an inspection of the work site for compliance with federal, state, and company rules and regulations. If the complaint is valid and imminent danger exists, the job and/or operation is shut down until the hazardous condition is corrected. When a complaint is valid and imminent danger does not exist, the hazardous condition is corrected or an alternate method of performing the operation is implemented. The ESHD tracks the hazardous condition report until the required action is completed. If the complaint is not valid, the supervisor at the work site is notified and the results of the investigation are documented.

Union Complaint Inspections. Any union complaint is thoroughly investigated by the ESHD. Upon arrival at the work site, the ESH representative contacts the responsible supervisor to discuss and evaluate the complaint. Union complaints and actions are handled in the same fashion as employee complaints.

Special Emphasis Inspections. ESH personnel are mandated to investigate, analyze, and resolve any identified problems with a particular process, piece of equipment, or trend. All discrepancies and violations are corrected and tracked.

Safety/Health/Environmental Assistance Visits. A safety professional, industrial hygienist, and environmental professional conduct safety assistance visits of all WSI work areas on an annual basis. The purpose of these visits are to assist the area supervisors in identifying and mitigating safety, health, and environmental concerns, and to train them on how to use their safety inspection checklist. Both in and out briefings are held with the affected Zone Security Manager, and details of the visit and corrective actions are discussed.

Management Walkdown. WSI Standard Procedure 1-3304, *Management Walkdown,* ensures compliance with safety program requirements, supports the implementation of the WSI Conduct of Operation Program, and enhances communication between management and employees. One senior manager/department manager performs a Management Walkdown weekly and provides a written report identifying the results of the survey in accordance with WSI Standard Procedure 1-3304. A Management Walkdown inspection checklist is followed by the individual performing the walkdown.

Equipment Inspections. A visual inspection of equipment is required prior to use. It is the responsibility of the supervisor to ensure that such requirements are met. This practice reduces the likelihood of an accident due to equipment failure. Properly maintained equipment also enhances

productivity. Equipment which has deficiencies is tagged and taken out of service until the proper requirements are met and a re-inspection of equipment is conducted.

All groups responsible for conducting inspections are trained to recognize hazards and potential hazards. They are expected to note and report any hazardous condition. Evaluation of inspection reports and employee interviews confirmed that once a hazard is reported, it is tracked to correction by the cognizant inspector. All employees interviewed were aware of the self-inspections and considered them to be thorough and an integral element of the WSI S&H program. Additionally, employees did not feel reluctant to express any concerns or point out any hazards to the various groups or individuals conducting the self-inspections.

Summary

The Onsite Review Team found WSI to have a comprehensive and functioning hazard control system in place. All identified hazards were mitigated effectively in a timely manner. Employees are an integral part of the hazard identification process. Accident investigations are comprehensive and complete and incorporate adequate systems for conveying lessons learned to all staff. In conclusion, WSI has a DOE-VPP Star program in the area of hazard control. ~

VII. Safety and Health Training

WSI has an exceptional S&H training program that has been in operation for 15 years and is continually being improved upon. The evaluation and interviews revealed no specific patterns or deficiencies that might affect the S&H program or WSI employees. Employees reported that S&H training helps them understand the potential hazards of their jobs and ways to protect themselves. The training staff is highly motivated and provides high quality training by virtue of their credentials and experience. It is clear that top management supports the training programs as evidenced by interviews with employees and supervisors, funding levels, reviews, and accreditations.

The WSI instructors train personnel as Security Officers, Security Police Officers II and III, Central Alarm System Operators, Law Enforcement Dispatch Center Dispatchers, plant-wide alternate alarm center operators, and other support staff functions. In accordance with WSI Standard Operating Procedures, training programs are in place to develop instructor skills and enhance subject matter expertise in the areas they teach.

OSHA training requirements are developed through the WSI Safety Training Needs Analysis and documented in the WSI Safety Training Matrix. This Matrix is divided into four sections to show what training will be given, the document requiring the training, the WSI Standard Operating Procedure that also requires the training, and who will receive the training.

Several of the safety courses developed by the site are required by Federal and State regulations; others come from supervisory job and task analyses. Training is completed in a setting that can be formal (held in a classroom) or job-specific (typically on-the-job training).

Instructional Systems Methodology

The Training Division is currently using the DOE-approved Guide to Good Practices and the Central Training Academy's Instructional Systems Development (ISD) methodology for developing and implementing necessary training.

ISD or performance-based training provides a total approach for the development and conduct of training programs. ISD consists of five phases: (1) analysis, (2) design, (3) development, (4) implementation, and (5) evaluation. The first four phases are generally sequential with the output of one phase providing input to the next. The evaluation phase is interactive and is applied throughout the process.

Training Automated Records Management

Training is documented at SRS by using the Training Automated Records Management System (TARMS), which allows for the storage and retrieval of employee training documentation by individuals, zone, area, shift, rank, and/or training subject. TARMS provides training personnel the ability to access current training information, schedule employees into training classes/weapons requalification/medical examinations, document completion of training attendance, identify training non-attendance, monitor fitness for duty qualifications, and publish restriction lists of personnel who do not meet minimum qualification standards.

Training Component Programs

All new employees at SRS complete an orientation program consisting of GET, an Employee Orientation, and completion of a New Employee Check List. These programs ensure that WSI personnel possess the knowledge and skills to operate in a safe and reliable manner under all conditions.

All WSI employees and any subcontractor or visitor assigned duties in any SRS area for more than ten days must complete GET given by WSRC before starting work at SRS. The GET includes a general description of facilities, policies, procedures, emergency plans, occupational safety, radiological health, and industrial hygiene programs.

Additionally, all WSI personnel are required to attend annual refresher training called Consolidated Annual Training (CAT). CAT provides a structured review and testing program to confirm that current employees are retaining the knowledge and skills learned in GET. The course covers annual and biannual regulatory training such as basic electrical safety, heat stress, medical exposure and OSHA rights, emergency preparedness, fire safety, and waste minimization. Although this is a WSRC course, WSI has CAT trained instructors and conducts the course for its employees. A computer-based version of CAT is also available for WSI personnel.

All workers requiring unescorted access to radiological controlled areas and radiation areas are required to attend a 16-hour Radiological Worker Training Level I course conducted by WSRC. A 24-hour course has been developed and is required by WSI for any employee required to enter radiologically controlled areas. Workers who require unescorted access to high radiation areas, contamination areas, soil contamination areas, and airborne radioactive areas, as well as radiological buffer areas and radiation areas are required to attend a 24-hour Radiological Worker Training Level II course, in addition to the 24 hour Level I course.

All protective force personnel attend an annual Industrial and Environmental Safety course that covers the rights and responsibilities of the employee as described in the OSHA and WSI Safety Programs. This course requires completion of a written examination.

Additional courses are required based on assignment of duties. The subjects of these required courses include Bloodborne Pathogens, PPE, Resource Conservation and Recovery Act, CPR/First Aid, Back Power (back injury/illness and exercise awareness), Emergency Response "Awareness Level" and "First Responder Level," Area Emergency Operations, Hazard Communications, Storm Water Pollution Prevention, Hazardous Waste Management, Hearing Conservation, Air Purifying Respirators, Supplied Air Respirators, Safe Driving, Exposure to Inorganic Lead, and Laser Safety for Class II and Class III.

Informal S&H training is addressed in various programs. Topics usually include site issues, general S&H information, as well as off-the-job safety topics (i.e., electrical safety and fire prevention at home).

Management and Supervisory Training

Currently there is no mandatory, topic-specific, S&H training for managers and supervisors. However, all WSI supervisors are required to complete the 40-hour Basic Instructor Training course which qualifies them to present training subjects to their personnel. In addition, supervisors complete the National Safety Council's Supervisor Development Program which allows them to become familiar with safe work procedures and safe use of equipment and tools.

Protective force line supervisors responsible for Safeguards and Security high risk training activities complete the one time Safety Officer Practical Training Orientation course with a written examination. This course includes ES&H regulations as well as specific training including weapons familiarization, range operations, and firearms risk analysis.

S&H training for top level managers is provided through a variety of methods including attendance at formal and informal courses. One of the most visible means of establishing and reviewing S&H responsibilities at the top management level is through their participation on the Executive Safety Committee. Top level managers also participate in GET and CAT, weekly staff meetings, and Management Walkdowns. Additional S&H training is accomplished during discussions of S&H issues at various safety meetings and committees, and attendance at offsite training.

Wackenhut Accident Reduction Process (WARP) Training

WSI recently implemented WARP, a proactive behavior-based accident reduction program that focuses on employee work behaviors, and identifies barriers to the continuous safety improvement process, at-risk behaviors, at-risk

conditions, and barriers which contribute to employees who cause injury or equipment damage. The WARP Steering Committee is actively involved, on a daily basis, in the structure and decisions of maintaining a safe work environment.

Summary

Information from interviews showed that employees at all levels knew how to protect themselves and others from hazards of the job. Protective force personnel are well aware of the hazards surrounding them and appear very knowledgeable of the procedures to follow in the event of responding to an accident or emergency involving hazardous materials. To the extent that this type of knowledge can be attributed to training programs, the program is effective and of VPP Star quality. ~

VIII. General Assessment

A. Safety and Health Conditions

The Team conducted a number of walkarounds, both as a group and individually, and conducted over one hundred interviews of WSI personnel. The consensus of the Team was that the site was exceptionally well maintained and that the S&H program demonstrated excellence in every component area.

B. Safety and Health Programs

The Team found the WSI S&H program to be highly effective. While minor opportunities for improvement were identified, the overall program is comprehensive and well communicated. ~

IX. Recommendation

It is the unanimous recommendation of the Onsite Review Team that Wackenhut Services, Inc., be accepted into the U.S. Department of Energy Voluntary Protection Program at the STAR level. ˜

Appendix: DOE-VPP Onsite Review Team for Wackenhut Services, Inc.

Name/Affiliation	Specialty/Organization	Area(s) of Responsibilities
FLORCZAK, Glenn	• Team Leader	C OSHA Compliance C Lockout/Tagout C Electrical Safety C Training Program C Program Evaluation C Visible Management Involvement C Roles and Responsibilities
GIBBS, Roy	• Assistant Team Leader	C Management Leadership and Commitment C Injury and Illness Recordkeeping C Program Evaluation C Employee Involvement C Authority and Resources C Line Accountability C Visible Management Involvement C Site Orientation
COFFMAN, Carlos	• DOE-HQ (EH-51)	C Training Program C Confined Space Entry C Explosives Safety C Radiation Protection C Self-Inspections C Preventive Maintenance C Access to Certified Professionals
FITZGERALD, Matthew	• Hazard Prevention and Control Lead • CIH, CSP • Consultant	C Worksite Analysis C Hazard Prevention and Control C Comprehensive Surveys C Accident Investigations C Medical Programs C Exercise Physiology C Job Hazard Analyses C Trending Analyses C Hazard Tracking C S&H Conditions C Emergency Response
GOUGE, Ron	C Former Hanford Worker C S&H Consultant	C Employee Involvement, Positive Reinforcement, Disciplinary System, Employee Reporting of Hazards
CUPPLES, Lisa	C Technical Editor C Consultant	C Team Administrative and Logistical Assistant C Report Coordination

DOE Senior HQ Officials

FITZGERALD, Joe	DOE-HQ (EH-5), Deputy Assistant Secretary for Worker Health and Safety
PETTENGILL, Harry	DOE-HQ (EH-51), Director, Office of Occupational Safety and Health Policy